<u>REMARKS</u>

Claims 29-46 are in the case and presented for consideration. Claims 1-28 have been canceled based on confusion that has arisen as a result of clerical error in the specification which will be described in more detail below. Accordingly, all previous amendments and arguments are retracted and recanted, as they were based on this confusion.

The specification contains some inconsistencies regarding the subject matter. The amendments to the specification are presented in order to help clarify these inconsistencies, or rather, to make one portion of the specification consistent with another portion of the specification. By relying on one <u>accurate</u> portion of the specification to correct, or make consistent, other portions which are inaccurate, Applicant avoids adding new matter.

More specifically, the inconsistencies revolve around how the specification defines the term "resources".

On page 3, beginning at line 21, the specification states that:

> "Since a display monitor such as used with a PC typically has an onboard controller and frame buffer, the invention preferably shares <u>these resources</u> with the functionality to render the digital images on the stand-alone monitor."

Thus, "these resources" clearly refers to the onboard controller and frame buffer. This is an accurate representation.

On page 7, beginning at line 4, the specification, in its original form, states that:

> "For example, the functions of the controller 520
> are performed by sharing resources within a
> microprocessor and graphics scaler of the monitor
> 100, thereby reducing additional cost in
> accordance with an object of the present
> invention."

The use of the term "resources" on page 4 as indicated in this excerpt is inaccurate and inconsistent with the meaning of the term "resources" on page 3 of the specification. That is, according to page 3, "resources" is a term that refers to the controller and the frame buffer as opposed to some characteristic "within the microprocessor and graphics scaler" (which cannot be the controller and frame buffer themselves as described on page 3). Thus, the reference to the term "resources" as related to characteristics of the microprocessor and graphics scaler has been removed.
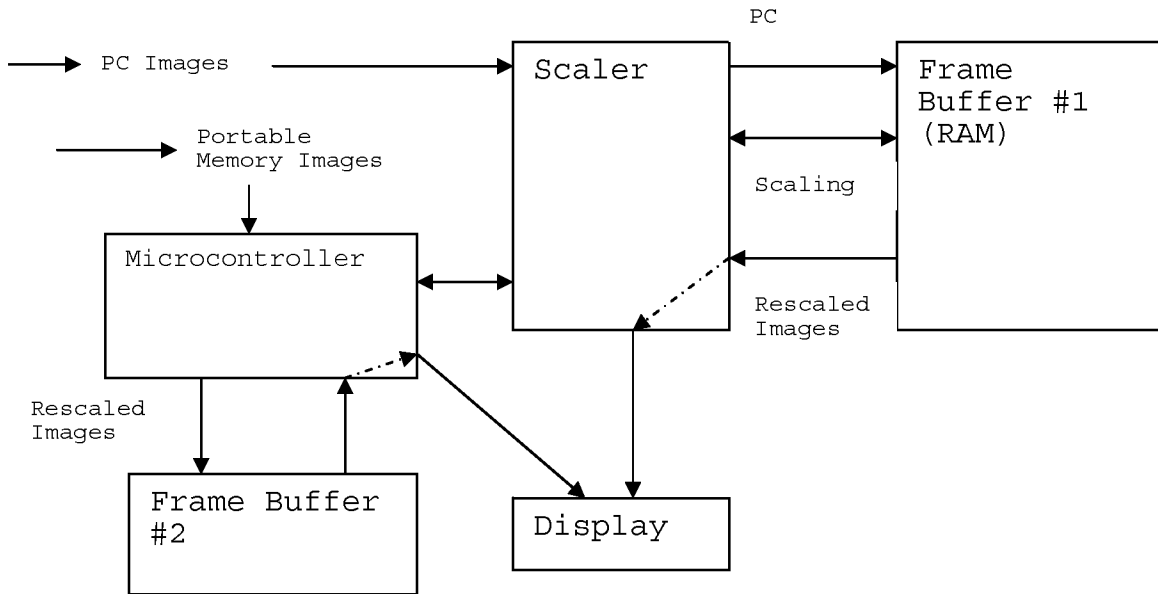
On page 9, beginning at line 22, the specification, in its original form, states that:

> The controller 520 and the RAM 540 is
> preferably realized by sharing resources within
> a microprocessor, scaler and frame buffer of
> the monitor 200.

Again, use of the term "resources" on page 9 is inaccurate and inconsistent with the meaning of the term "resources" on page 3 of the specification. That is, according to page 3, "resources" is a term that refers to the controller and the frame buffer as opposed to some characteristic "within a microprocessor, scaler and frame buffer" (which cannot be the controller or frame buffer described on page 3). Thus, the reference to the term "resources" as related to the microprocessor and graphics scaler has been removed.

Turning to the claims, claim 29 claims a monitor including *inter alia* "a frame buffer shared between facilitating display of the digital image from the storage medium and facilitating display from a PC". The new claim language finds support from the specification, which explains in the sentence on page 3, line 22 that a display monitor as used with a PC has a frame buffer which is a resource that can be shared with the functionality to render or display the type of digital images which are described earlier in the paragraph as originating from storage medium. Notably, Applicant only submits this excerpt for support for a claim limitation, and such excerpt should not be construed as limiting the claim in any particular way.

In addressing the references which are currently on record, Applicant respectfully submits that none of the references cited teach or fairly suggest a single frame buffer that is shared between facilitating both 1) display of a digital image from the storage medium and 2) display from a PC. In fact, the cited references do not disclose at all how images are handled. As this Examiner has previously made a variety of assumptions, indicating certain features to be implicitly or inherently in the cited references, Applicant believes that the likely structure of the Sony TV with Memory Stick in combination with the Sony Cyberframe is the following:

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  ┌──────────→ PC Images ──────────────────→┌──────────┐        PC   ┌──────────┐
                                            │          │ ─────────→  │ Frame    │
                                            │  Scaler  │             │ Buffer #1│
  ┌──────────→ Portable                     │          │ ←───────→   │ (RAM)    │
               Memory Images                │          │   Scaling   │          │
                        │                   │          │             │          │
                        ↓                   │          │ ←───────────│          │
          ┌────────────────────┐           │          │   Rescaled  │          │
          │                    │           │          │   Images    │          │
          │  Microcontroller   │ ←───────→ └──────────┘             └──────────┘
          │                    │
          │                    │
          └────────────────────┘
   Rescaled      │
   Images        ↓
          ┌────────────────┐      ┌────────────────┐
          │ Frame Buffer   │      │    Display     │
          │ #2             │      │                │
          └────────────────┘      └────────────────┘
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As shown in the drawing above, a sophisticated microcontroller is required, that is used to both rescale the images from the external portable memory and refresh them to the display itself, leaving the scaler and frame buffer #1 unused with regard to the images derived from portable memory, while acting as a digital picture frame. This cited product also requires two separate physical frame buffers (#1) and (#2). Since Applicant believes this to be the structure of the cited reference(s), and the publications provided by the Examiner do not indicate otherwise, and in fact do not specifically and explicitly disclose "a frame buffer that is shared between facilitating display of the digital image from the storage medium and facilitating display from a PC", as recited in claim 29, claim 29 is believed to be patentable.

Independent claims 39, 44, and 46 also recite limitations which are believed to be patentable.

Accordingly, the application and claims are believed to be in condition for allowance, and favorable action is respectfully requested. No new matter has been added.

If any issues remain which may be resolved by telephonic communication, the Examiner is respectfully invited to contact the undersigned at the number below, if such will advance the application to allowance.

The Commissioner is hereby authorized to credit any overpayment or charge any fee (except the issue fee) to Deposit Account No. 14-1270.

Respectfully submitted,

By /Yan Glickberg/

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